

Privacy clause
Whistleblowing and enquiry management system

Pursuant to data protection rules, we hereby inform that the controller of your personal data is Torrassapel, S.A. with CIF: A58781402 with registered office at at Calle Llull, 331, 08019 Barcelona. The purpose of the processing is to receive reports or enquiries, decide whether to initiate an investigation of the reported facts, protect the whistleblower from retaliation and, if necessary, take appropriate corrective measures or legal action against those reported or third parties. Furthermore, to demonstrate the proper functioning of the Prevention and Control Model and defend the Company's interests. You may exercise your data protection rights of access, rectification, erasure, objection, restriction or portability by email to privacy@lecta.com including the reference "Data protection". Further information on the processing of your personal data can be found at the [following link](#).

Data protection policy of the Whistleblower and enquiry management system

Pursuant to Regulation (EU) 2016/679 of 27 April 1995 on the protection of individuals with regard to the processing of their personal data (GDPR); Spanish Organic Law 3/2018 of 5 December 1995 on the protection of personal data and the guarantee of digital rights (LOPDGDD); and Spanish Law 2/2023 of 20 February 1995 regulating the protection of persons involved in criminal offences and combating corruption (Law on the protection of the reporting person), as well as the provisions of the other applicable legislation on data protection, please find below how we process personal data provided to us through the Whistleblower and Enquiry Management System.

The Whistleblower and Enquiry Management System contains the necessary measures to ensure the confidentiality of the identity and protection of the reporting person and any third party mentioned in the communication. It prevents unauthorised persons from accessing the information.

1. DATA CONTROLLER

Your personal data shall be processed by Torraspapel, S.A. (hereinafter “Torraspapel”) with Tax Identification Code CIF: A58781402 and registered address at Calle Llull, 331, 08019 Barcelona.

In the event the information provided relates to any of the companies belonging to Torraspapel, we may communicate your information to such entity in order to take appropriate action in relation to the complaint or enquiry. Find out which entities are part of Torraspapel [here](#).

2. PURPOSES

Depending on the processing carried out, personal data may be processed for the following purposes:

<i>Purpose</i>	<i>Description of the purpose and legitimate basis</i>
<i>Resolve enquiries</i>	<p>We will process the data to respond to enquiries concerning the operation and management of the Complaint and Enquiry Management System or the Prevention and Control Model.</p> <p>Legitimate basis: legitimate interest</p>
<i>Receipt and handling of complaints and enquiries</i>	<p>We will process the data for receiving complaints and enquiries, deciding whether or not to initiate an investigation of the complaints received, including for the purpose of carrying out the corresponding investigation into the reported or enquired facts, protecting the reporting person from retaliation, taking, if necessary, appropriate corrective measures and, where appropriate, taking legal action against the reported or third parties.</p> <p>If the complaint is communicated orally, we hereby inform you that we are obliged to document the complaint in one of the following ways, as you choose:</p> <p>(a) by recording the conversation in a secure, durable and accessible format; or</p> <p>(b) by means of a complete and accurate transcript of the conversation made by the staff responsible for processing it.</p> <p>In case of transcription of the conversation, you will have the opportunity to check, rectify and accept by signing the transcript of the conversation.</p> <p>Legitimate basis: legal obligation (private sector subjects obliged)/public interest (private sector subjects not obliged)</p>
<i>Prove proper functioning of the Complaint and Enquiry Management System and the Prevention and Control Model, and to preserve evidence for the defence of Torraspapel</i>	<p>We may retain your data to prove the proper functioning of our Complaint and Enquiry Management System, of our Model Prevention and Control or to retain evidence for the Company's defence.</p> <p>Basis of standing: legitimate interest and legal obligation</p>

3. TYPE OF PERSONAL DATA THAT MAY BE PROCESSED

Whether you provide us with your personal data directly or by a third party, we will process the following personal data:

Typology of data subjects	Data categories
Person making the enquiry	Identification data of the person making the enquiry, contact details, employment data, economic data and other data associated with the enquiry, evidence.
Nominative reporting person	Identification data, contact details, details of facts considered relevant, evidence and voice.
Anonymous reporting person <i>(The reporting person may provide the following data or none of them)</i>	Pseudonym, contact details, evidence, voice.
Subject to the complaint	Identification data, data associated with the conduct reported, evidence.
Witness	Identification data, contact details, data associated with the reported conduct, evidence.
Third parties	Identification data, contact details, data associated with the conduct reported, evidence.

In the course of the management of the communication submitted by you, you may be asked to clarify the information communicated or ask you to provide additional information.

4. LEGITIMATE BASIS

We will process your data in accordance with one or more of the following legitimate basis set out above:

<i>Legitimate basis</i>	<i>Description</i>
<i>Performance of a contract</i>	We will process your data if this is necessary for the performance of a contract, in order to fulfil the obligations set out in the contract.
<i>Legal obligation</i>	We may process your personal data because a law obliges us to do so.
<i>Public interest</i>	We may also have to process your data for the performance of a task carried out in the public interest or in the exercise of public authority vested in us.
<i>Legitimate interest</i>	<p>We may process your data where this is necessary for the purposes of satisfying prevailing legitimate interests that we may have as the Controller.</p> <p>For further information on the balancing of legitimate interests carried out in each case, please contact privacy@lecta.com</p>

5. COMMUNICATION OF DATA

As a general rule, your personal data shall be confidential and shall not be disclosed either to the persons to whom the facts reported relate or to third parties.

However, your personal data may be communicated to those external service providers which we have contracted for the receipt of the channel information and, where appropriate, for the management and conduct of the necessary investigations, which shall process the data as the Processor and, under no circumstances, shall process the data for their own purposes.

They may also be notified to the law enforcement agencies, judges or courts, or any other competent body, should they be required to comply with the legislation in force.

Where there are indications that the reported acts may constitute a criminal offence, there is an obligation to notify the public prosecutor's office immediately. If the reported facts may affect the financial interests of the European Union, in this case they shall be referred to the European Public Prosecutor's Office.

6. INTERNATIONAL TRANSFERS OF DATA

Your personal data may be processed outside the European Union or the European Economic Area.

In such a case, Torraspapel shall ensure that such data processing is always protected with appropriate safeguards, which may include:

- Standard clauses approved by the EU: these are contracts approved by the European regulator, which provide sufficient guarantees to ensure that the processing complies with the requirements of the European Data Protection Regulation.
- Third-party certifications: framework agreement between the EU and a third state establishing a standardised framework for data processing in line with the requirements of the European Data Protection Regulation.

7. DURATION OF THE PROCESSING

- **Enquiries**

In the event of an enquiry, the personal data shall be kept for the time necessary to resolve the doubt or question raised and to provide the data subject with the answer. After the end of the corresponding retention period, the data may be properly blocked and retained in order to prove compliance with the Torraspapel Prevention and Control Model and, where appropriate, to comply with legal obligations. Once this deadline has passed, the data shall be permanently deleted.

- **Complaints**

The personal data shall be kept in the complaint channel of the Complaint Management System only for the time necessary to decide on the merits of initiating an investigation into the reported facts and, in any case, for a maximum period of three (3) months from the date on which the acknowledgement of receipt was sent or, if we have not acknowledged receipt, a maximum period of three (3) months from the date on which the complaint was sent.

If no investigative action has been initiated within three (3) months of receipt of the complaint, the data from the Complaint Management System shall be deleted, unless they are kept as evidence of the proper functioning of the system, in which case they shall be anonymised, without the blocking obligation laid down in the LOPDGDD being applicable.

In the case of complaints admitted for processing, they shall be kept in the Complaint Management System for the duration of the investigation and, as a general rule, for a maximum period of ten (10) years. However, we may extend this maximum retention period in the following cases:

1. To prove the effective functioning of our Prevention and Control Model in accordance with the provisions of Article 31 bis of the Spanish Criminal Code, considering the statute of limitations for offences in accordance with the provisions of such Criminal Code.
2. Where the reported act constitutes an offence or administrative infringement, during the limitation period for offences laid down in the Spanish Criminal Code and, in the case of administrative penalties, in accordance with the time limit laid down in the laws applicable to each case.

Once the relevant retention period has expired, they shall be permanently destroyed.

We hereby inform you that we shall immediately delete personal data in certain cases, without the obligation to block them:

- If it is established that the information provided or part of it is not true, unless the lack of veracity constitutes a criminal offence, in which case the data shall be kept for the necessary time during the judicial proceedings.

- If personal data have been disclosed which are not necessary for the knowledge and investigation of acts or omissions within the scope of this reporting channel, including special categories of data. In the latter case, they shall be deleted immediately, without recording and processing.

8. EXERCISE OF RIGHTS

The data subject may from time to time exercise his/her data protection rights (including withdrawal of consent given) of access, rectification, erasure, objection, portability and restriction free of charge by writing to privacy@lecta.com with the reference “Data protection”.

If we have doubts about your identity, i.e. that it is you who exercises the corresponding data protection right, we may ask you for a copy of your ID card or equivalent document proving your identity and, once your identity has been verified, execute your request for exercise of rights.

However, where the person under investigation exercises the right of objection to the processing of his/her personal data, it shall be presumed that, unless proven otherwise, there are compelling legitimate grounds for further processing of his/her personal data.

If you have any questions or complaints about how we process your personal data, please contact the following email: privacy@lecta.com

In addition, you may lodge a complaint with the Spanish Data Protection Agency (www.aepd.es) if you consider that we have not properly dealt with your rights.

9. ADDITIONAL INFORMATION

For more information on how to exercise your data protection rights, please refer to our web privacy policy [here](#).